



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMYSHIA EVETTE MANGUM and
STANTON IRVIN MACK,

Defendant.

CR No. 2:24-cr-00128-HDV

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to
Commit Bank Fraud; 18 U.S.C.
§ 1028A(a)(1): Aggravated Identity
Theft]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATION

1. At times relevant to this Indictment, California State L.A.
Federal Credit Union was a financial institution insured by the
National Credit Union Share Insurance Fund.

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1 B. OBJECT OF THE CONSPIRACY

2 2. Beginning on a date unknown to the Grand Jury, but no later
3 than on or about January 20, 2023, and continuing through at least
4 January 27, 2023, in Los Angeles County, within the Central District
5 of California, and elsewhere, defendants EMYSHIA EVETTE MANGUM and
6 STANTON IRVIN MACK conspired to commit bank fraud, in violation of
7 Title 18, United States Code, Section 1344, by submitting a false and
8 fraudulent application for a credit union account using personal
9 information stolen from victims.

10 C. MANNER AND MEANS OF THE CONSPIRACY

11 3. The object of the conspiracy was carried out, and was to be
12 carried out, in the following manner:

13 a. Defendant MANGUM, together with co-conspirators, would
14 obtain a United States Treasury check in the name of an identity
15 theft victim without the victim's permission.

16 b. Defendant MANGUM and a co-conspirator would then
17 attempt to open a new credit union account in the name of that
18 identity theft victim at a credit union where another co-conspirator,
19 namely, defendant MACK, worked as a teller, by submitting fraudulent
20 driver's licenses and other supporting documentation in the name of
21 identity theft victims.

22 c. Defendant MANGUM would then attempt to deposit the
23 United States Treasury Check at defendant MACK's window at that
24 credit union.

25 d. Defendant MACK would then attempt to approve the
26 opening of the credit union account despite knowing that the
27 documentation provided to him was fraudulent.

28 e. In doing so, defendant MANGUM falsely represented to

1 the credit union that she was the person associated with the account
2 application and the stolen check. Defendant MANGUM also concealed
3 that the application was made without the consent or knowledge of the
4 identity theft victims named in the application.

5 D. OVERT ACTS

6 4. On or about the following dates, in furtherance of the
7 conspiracy and to accomplish its object, defendants MANGUM and MACK,
8 and others known and unknown to the Grand Jury, committed various
9 overt acts within the Central District of California, and elsewhere,
10 including, but not limited to:

11 Overt Act No. 1: On January 27, 2023, defendant MANGUM and a
12 conspirator entered the California State L.A. Federal Credit Union
13 and filed an application to open an account using A.L. and I.L.'s
14 personal identifying information, without either A.L. or I.L.'s
15 knowledge, consent, or authorization.

16 Overt Act No. 2: On January 27, 2023, defendant MANGUM and a
17 conspirator attempted to deposit at California State L.A. Federal
18 Credit Union a United States Treasury Check for \$3,229,590.81
19 addressed to A.L. and I.L.

20 Overt Act No. 3: On or about January 27, 2023, defendant MACK
21 approved the application for a new account at the California State
22 L.A. Federal Credit Union in A.L. and I.L.'s name, despite knowing of
23 its fraudulent nature.

COUNT TWO

[18 U.S.C. §§ 1028A(a)(1), 2(a)]

[ALL DEFENDANTS]

On or about January 27, 2023, in Los Angeles County, within the Central District of California, defendants EMYSHIA EVETTE MANGUM and STANTON IRVIN MACK, each aiding and abetting the other, knowingly transferred, possessed, and used without lawful authority, means of identification that defendants MANGUM and MACK knew belonged to another person, that is, the names and dates of birth of victims I.L. and A.L., during and in relation to the offense of Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment.

A TRUE BILL

/s/

Foreperson

E. MARTIN ESTRADA
United States Attorney

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Assistant United States Attorney
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